

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**DAVITA KEY,**

**Plaintiff,**

**V.**

**HYUNDAI MOTOR  
MANUFACTURING, ALABAMA,  
LLC; HYUNDAI ENG AMERICA,  
INC. and DYNAMIC SECURITY,  
INC.,**

## Defendants.

**Civil Action No.:**  
**2:19-cv-00767-ECM**

## HYUNDAI ENG AMERICA, INC.'S AMENDED TRIAL EXHIBIT LIST

Defendant Hyundai Eng America, Inc. (“HEA”) submits the following Amended Trial Exhibit List. In addition to the pleadings, HEA reserves the right to use at trial any of the following exhibits, and any exhibit(s) identified in the other parties’ exhibit lists without conceding the admissibility of same into evidence. HEA further reserves the right to identify as an exhibit at trial, for rebuttal or impeachment purposes, any document or other evidence as permitted under the Federal Rules of Civil Procedure or the Federal Rules of Evidence. The exhibits listed are identified by Bates numbers corresponding to the parties’ productions during the court of litigation. HEA will make another copy of these documents available to any party upon request.

**Exhibits HEA Expects to Use at Trial**

<b>EXH #</b>	<b>DESCRIPTION</b>
HEA 001	Appearance Standards for Security Personnel (HEA0001-0003)
HEA 002	Hyundai Eng America, Inc. – Appearance Standards for Security Contractors (HEA0163-0166)
HEA 003	HEA Employee Handbook (HEA0004-0048)
HEA 004	Photos of Davita Key’s hair (Key000271-000276 and HEA0193)

**Exhibits HEA May Use If the Need Arises**

<b>EXH #</b>	<b>DESCRIPTION</b>
HEA 005	Davita Key Dynamic Security Paycheck 8/22/2017 (Key000001)
HEA 006	Davita Key Resume (Key000034-000036)
HEA 007	Davita Key Kelly Services Pay Records (Key000114-000127)
HEA 008	Davita Key Pike Road Schools Pay Records (Key000128)
HEA 009	December 6, 2021 Plaintiff’s Response to Defendant HMMA’s Interrogatories
HEA 010	January 14, 2022 Plaintiff’s Supplemental Response to Defendant HMMA’s Interrogatories
HEA 011	January 28, 2022 Plaintiff’s Supplemental Response to Defendant HMMA’s Interrogatories
HEA 012	Plaintiff’s Response to Defendant Dynamic Security Inc.’s First Request for Admissions
HEA 013	Plaintiff’s Response to Defendant Dynamic Security Inc.’s First Interrogatories
HEA 014	Plaintiff’s Discovery Responses to HEA
HEA 015	June 20, 2022 Deposition of Davita Key
HEA 016	Declaration of Gloria Robinson (Doc. 68-5)
HEA 017	Handwritten document from Davita Key (Dynamic-Key 32)
	Any documents needed for impeachment or rebuttal

Respectfully submitted this 8th day of February 2023,

*/s/ T. Matthew Miller*

T. Matthew Miller (ASB-2129-I66T)

*One of the Attorneys for Defendant*

*Hyundai ENG America, Inc.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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